



**Western
Massachusetts
Electric**

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Stephen Klionsky, Esq.

September 15, 2005

Ms. Mary L. Cottrell
Secretary
Dept. of Telecommunications & Energy
One South Station
Boston, MA 02110

Re: Docket No. DTE 01-106 - Increasing the Penetration Rate for Discounted Electric, Gas and Telephone Service

Dear Ms. Cottrell:

This letter provides the response to requests for the information listed below.

Response to DTE-01 Interrogatories dated 09/09/2005

DTE-01-001,002,003,004,005,006,007,008

Very truly yours,

Stephen Klionsky

SK/jms

Witness: Edward A. Davis
Request from: Department of Telecommunications and Energy

Question:

On an individual company basis, please provide the amount of low-income discount that is currently included in base rates. Provide a citation to the company's last base rate proceeding or settlement where this amount was established. Provide the number of customers on each low-income discount rate at the end of the test year that was used in the company's last base rate proceeding or settlement. Provide the number of customers on each low-income discount rate as of August 1, 2005. In addition, provide the total consumption of the low-income customers for each low-income rate class.

Response:

The Company's current distribution rates effective January 1, 2005 are based on Docket No. D.T.E. 04-106 Rate Settlement Agreement. The Settlement Agreement does not explicitly specify the level of the low-income discount. However, the Company has calculated the level of low-income discount at \$3,548,585 (see page 2 of 2, attached). The calculation is based on the Settlement Agreements Rate R-2 and R-4 billing determinants times the price differentials between Rate R-1 versus Rate R-2 and Rate R-3 versus Rate R-4.

The Company's Rate Settlement Agreement was based on a test year ending August 1997. The number of customers in August 1997 that were billed on the Company's Low Income Rider applicable to Rate R-1 and Rate R-3 were 13,024 and 2,066, respectively.

The number of customers and kWh consumption for low-income Rates R-2 and R-4 as of August 1, 2005 are as follows:

	Billing Month July 2005	
	<u>Customers</u>	<u>Sales (kWh)</u>
Rate R-2	18,853	13,704,058
Rate R-4	2,134	1,887,765

WMECO Low-Income Discount
D.T.E. 04-106 WMECO Settlement Filing

<u>Rate R-2 Calculation</u>	<u>Rate R-2</u>		<u>Differential</u> C = A - B	<u>Rate R-2</u> Test Year Aug 1997		<u>Low-Income Discount</u>		
	<u>Rate R-1</u>	<u>Rate R-2</u>		<u>Bills</u>	<u>Sales (kWh)</u>	<u>Customer</u>	<u>Energy</u>	<u>Total</u>
	(A)	(B)		(D)	(E)	<u>Charge</u> F = D * C	<u>Charge</u> G = E * C	<u>Rate R-2</u> H = F + G
Customer Charge	8.53	5.54	2.99	164,472		\$ 491,771		
Energy Charge	0.09800	0.06772	0.03028		68,346,554		\$ 2,069,534	
								\$ 2,561,305

<u>Rate R-4 Calculation</u>	<u>Rate R-4</u>		<u>Differential</u> K = I - J	<u>Rate R-4</u> Test Year Aug 1997		<u>Low-Income Discount</u>		
	<u>Rate R-3</u>	<u>Rate R-4</u>		<u>Bills</u>	<u>Sales (kWh)</u>	<u>Customer</u>	<u>Energy</u>	<u>Total</u>
	(I)	(J)		(L)	(M)	<u>Charge</u> N = L * K	<u>Charge</u> O = M * K	<u>Rate R-4</u> P = N + O
Customer Charge	8.53	5.54	2.99	25,416		\$ 75,994		
Energy Charge	0.09800	0.06772	0.03028		30,095,330		\$ 911,287	
								\$ 987,280

Total Low-Income Discount = \$ 3,548,585

Western Massachusetts Electric Company
Docket No. DTE 01-106

Information Request DTE-01
Dated: 09/02/2005
Q- DTE1-002
Page 1 of 3

Witness: Edward A. Davis
Request from: Department of Telecommunications and Energy

Question:

On an individual company basis, please provide the amount of low-income discount that was included in base rates when the company's rates were unbundled. Also, provide the number of customers on each low-income discount rate as of the date that the company's rates were unbundled.

Response:

The Company's rates were unbundled effective March 1, 1998 in Docket No. D.T.E. 97-120. The total low-income discount included in rates was \$3,852,433 (see attached page 2 of 3, line 42, which shows the Rate R-1 Low-Income discount of \$2,847,162, and page 3 of 3, line 42, which shows the Rate R-3 Low-Income Discount of \$1,005,271).

The number of customers in March 1998 that were billed on the Company's Low Income Rider applicable to Rate R-1 and Rate R-3 were 18,186 and 2,528, respectively.

Exhibit 5

Revised February 27, 1998
Docket No. D.T.E 97-120
WMECO 2/20/98 Compliance
Page 1 of 12

1
2 Western Massachusetts Electric Company
3
4 Rate R-1 Residential
5

Test Year	Units	Pre-Discounted	
		Rate \$	Revenue
Customer Charge (includes ECS)	1,670,736	9.66	\$16,139,310
Seasonal Credit	1,480	(10.00)	(\$14,800)
<u>Water Heating Credits</u>			
Bills 401 to 600 kwh (single)	32,240	(1.50)	(\$48,360)
Bills 601 kwh and over (single)	76,531	(3.00)	(\$229,593)
Bills 401 to 600 kwh (dual)	4,475	(2.00)	(\$8,951)
Bills 601 kwh and over (dual)	12,491	(4.00)	(\$49,966)
Energy Charge	864,680,555	0.095424	\$82,511,277
Conservation Charge	864,680,555	0.002505	\$2,166,025
Fuel Expense Adjustment Clause	864,680,555	0.011220	\$9,701,716
R1 Regular Revenue			\$110,166,659
<u>R1 Low Income Customers</u>			
Customer Charge (includes ECS)	164,472	9.66	\$1,588,800
<u>Water Heating Credits</u>			
Bills 401 to 600 kwh (single)	2,403	(1.50)	(\$3,605)
Bills 601 kwh and over (single)	4,402	(3.00)	(\$13,205)
Bills 401 to 600 kwh (dual)	309	(2.00)	(\$619)
Bills 601 kwh and over (dual)	627	(4.00)	(\$2,509)
Energy Charge	75,998,636	0.095424	\$7,252,094
Conservation Charge	75,998,636	0.002505	\$190,377
Fuel Expense Adjustment Clause	75,998,636	0.011220	\$852,705
Total Revenue			\$9,864,037
Low Income Discount 35%			(\$3,160,944)
R-1 Low Income Total			\$6,703,092
R-1 Pre-Discount Rate Revenue			\$116,869,751

Test Year	Units	Proposed Unbundled	
		Rate	Revenue
Customer Charge	1,670,736	\$8.69	\$14,518,696
Seasonal Credit	1,480	(\$9.00)	(\$13,320)
<u>Water Heating Credits</u>			
Bills 401 to 600 kwh (single)	32,240	(\$1.35)	(\$43,524)
Bills 601 kwh and over (single)	76,531	(\$2.70)	(\$206,634)
Bills 401 to 600 kwh (dual)	4,475	(\$1.80)	(\$8,056)
Bills 601 kwh and over (dual)	12,491	(\$3.60)	(\$44,969)
<u>Energy Charge</u>			
Distribution	864,680,555	\$0.03112	\$26,908,859
Transmission		\$0.00283	\$2,447,046
Demand Side Management		\$0.00330	\$2,853,446
Renewable Energy		\$0.00075	\$648,510
Transition		\$0.03223	\$27,868,654
Standard Service		\$0.02800	\$24,211,056
R1 Regular Revenue			\$99,139,765
		% Change	-10.01%
<u>R1 Low Income Customers</u>			
Customer Charge	164,472	\$8.69	\$1,429,262
<u>Water Heating Credits</u>			
Bills 401 to 600 kwh (single)	2,403	(\$1.35)	(\$3,245)
Bills 601 kwh and over (single)	4,402	(\$2.70)	(\$11,885)
Bills 401 to 600 kwh (dual)	309	(\$1.80)	(\$557)
Bills 601 kwh and over (dual)	627	(\$3.60)	(\$2,258)
<u>Energy Charge</u>			
Distribution	75,998,636	\$0.03112	\$2,365,078
Transmission		\$0.00283	\$215,076
Demand Side Management		\$0.00330	\$250,795
Renewable Energy		\$0.00075	\$56,999
Transition		\$0.03223	\$2,449,436
Standard Service		\$0.02800	\$2,127,962
Total Revenue			\$8,876,663
Low Income Discount 45.6%			(\$2,847,162)
R1 Low Income Total			\$6,029,502
		% Change	-10.05%
R1 Proposed Rate Revenue			\$105,169,267
		% Change	-10.01%

Functional Category	Proposed Revenue	cents/kWh
Distribution	\$42,040,286	4.469
Transmission	\$2,662,122	0.283
Demand Side Management	\$3,104,241	0.330
Renewable Energy	\$705,509	0.075
Transition	\$30,318,090	3.223
Standard Service	\$26,339,017	2.800
	\$105,169,267	11.180

Note: Customer Charge Revenue and Water Heating Credits are included in the Distribution Category.

Exhibit 5

Revised February 27, 1998
Docket No. D.T.E 97-120
WMECO 2/20/98 Compliance
Page 2 of 12

1
2 Western Massachusetts Electric Company
3
4 Rate R-3 Residential Space Heating
5

Price Blocks	Test Year Units	Pre-Discount	
		Rate \$	Revenue
Customer Charge (includes ECS)	253,692	9.66	\$2,450,665
Seasonal Credit	215	(10.00)	(\$2,150)
Water Heating Credits			
Bills 401 to 600 kwh (single)	16,485	(1.50)	(\$24,727)
Bills 601 kwh and over (single)	84,587	(3.00)	(\$253,762)
Bills 401 to 600 kwh (dual)	1,427	(2.00)	(\$2,854)
Bills 601 kwh and over (dual)	9,418	(4.00)	(\$37,673)
Energy Charge	256,258,606	0.095424	\$24,453,221
Conservation Charge	256,258,606	0.011220	\$2,875,222
Fuel Expense Adjustment Clause	256,258,606	0.002505	\$641,928
R-3 Regular Revenue			\$30,099,870
R3 Low Income Customers			
Customer Charge (includes ECS)	25,416	9.66	\$245,519
Water Heating Credits			
Bills 401 to 600 kwh (single)	1,345	(1.50)	(\$2,017)
Bills 601 kwh and over (single)	8,501	(3.00)	(\$25,504)
Bills 401 to 600 kwh (dual)	91	(2.00)	(\$182)
Bills 601 kwh and over (dual)	673	(4.00)	(\$2,691)
Energy Charge	30,095,330	0.095424	\$2,871,817
Fuel Expense Adjustment Clause	30,095,330	0.011220	\$337,670
Conservation Charge	30,095,330	0.002505	\$75,389
Total Revenue			\$3,500,000
Low Income Discount 35%			(\$1,117,453)
R-3 Low Income Total			\$2,382,546
R-3 Pre-Discount Rate Revenue			\$32,482,416

Price Blocks	Test Year Units	Proposed Unbundled	
		Rate	Revenue
Customer Charge	253,692	\$8.69	\$2,204,583
Seasonal Credit	215	(\$9.00)	(\$1,935)
Water Heating Credits			
Bills 401 to 600 kwh (single)	16,485	(\$1.35)	(\$22,254)
Bills 601 kwh and over (single)	84,587	(\$2.70)	(\$228,385)
Bills 401 to 600 kwh (dual)	1,427	(\$1.80)	(\$2,569)
Bills 601 kwh and over (dual)	9,418	(\$3.60)	(\$33,905)
Energy Charge	256,258,606		
Distribution		\$0.03120	\$7,995,269
Transmission		\$0.00275	\$704,711
Demand Side Management		\$0.00330	\$845,653
Renewable Energy		\$0.00075	\$192,194
Transition		\$0.03223	\$8,259,215
Standard Service		\$0.02800	\$7,175,241
R-3 Regular Revenue			\$27,087,817
		% Change	-10.01%
R3 Low Income Customers			
Customer Charge	25,416	\$8.69	\$220,865
Water Heating Credits			
Bills 401 to 600 kwh (single)	1,345	(\$1.35)	(\$1,815)
Bills 601 kwh and over (single)	8,501	(\$2.70)	(\$22,954)
Bills 401 to 600 kwh (dual)	91	(\$1.80)	(\$164)
Bills 601 kwh and over (dual)	673	(\$3.60)	(\$2,422)
Energy Charge	30,095,330		
Distribution		\$0.03120	\$938,974
Transmission		\$0.00275	\$82,762
Demand Side Management		\$0.00330	\$99,315
Renewable Energy		\$0.00075	\$22,571
Transition		\$0.03223	\$969,972
Standard Service		\$0.02800	\$842,669
Total Revenue			\$3,149,775
Low Income Discount 47.2			(\$1,005,271)
R-3 Low Income Total			\$2,144,504
		% Change	-9.99%
R-3 Proposed Unbundled Rate Revenue			\$29,232,321
		% Change	-10.01%

Functional Category	Proposed Revenue	cents/kWh
Distribution	\$10,038,017	3.505
Transmission	\$787,473	0.275
Demand Side Management	\$944,968	0.330
Renewable Energy	\$214,765	0.075
Transition	\$9,229,187	3.223
Standard Service	\$8,017,910	2.800
	\$29,232,321	10.208

Note: Customer Charge Revenue and Water Heating Credits are included in the Distribution Category.

Western Massachusetts Electric Company
Docket No. DTE 01-106

Information Request DTE-01
Dated: 09/02/2005
Q- DTE1-003
Page 1 of 1

Witness: Edward A. Davis
Request from: Department of Telecommunications and Energy

Question:

Please discuss which interest rate is appropriate to apply to any over- or under- recovery that results from a cost recovery mechanism.

Response:

The discount offered to low income customers is a reduction in revenues from WMECO's standard residential tariff rates. WMECO's customer tariffs including its residential tariff is based on WMECO's allowed revenue requirement needed to recover operating expenses and earn a return on its investment. By providing the low income customer with a discount on rates, the Company cannot have the opportunity to recover its full cost of service and earn a rate of return on its investment as allowed by the Department. Based on G.L. c. 164, 1F(4)(i) and the Department's decision in DTE 01-106B, Page 8-9, the Company is allowed to recover the lost revenue which includes the Company's lost return on investment at its allowed cost of capital. Because this lost revenue relates to the Company's lost opportunity to earn its return on investment in a timely manner the Company believes it is appropriate to calculate a carrying charge on the lost revenue deferral at the same cost of capital that is allowed in customer tariffs prior to the customer discount.

Witness: Robert G. Johnston
Request from: Department of Telecommunications and Energy

Question:

Please provide a detailed explanation of the company's existing traditional outreach methods (i.e., not including the computer matching program) to ensure that the low-income discount rate is available to eligible customers. How often is each method of outreach conducted? What is the protocol for signing up new customers for the low-income discount rate under these traditional outreach methods? What is the protocol for removing customers from the low-income rate under traditional outreach methods?

Response:

Outreach Efforts

- Full time staff person who coordinates outreach efforts.
- Residential customers who are verified on the following programs are placed on the discount rate:
 - Fuel Assistance
 - Public/Subsidized Housing
 - MassHealth
 - Head Start
 - School Lunch/Breakfast (free)
 - Veterans Chapter 115 Benefits
 - Veterans Non-Service Pension Programs or DIC for Parents of Veterans
 - Transitional Aid to Families with Dependent Children (TAFDC)
 - Emergency Assistance to Elderly, Disabled, and Children (EAEDC)
 - Supplemental Security Income (SSI)
 - Food Stamps
 - Prescription Advantage and/or other means tested programs not listed
- Customers are directed to their local Community Action Agency to sign up for Fuel Assistance, utility discounts and weatherization services in order to receive the maximum savings available. Customers can also access the Residential Discount Rate ("RDR") application on our web-site at wmeco.com (in English and Spanish) or by calling customer service to have a form mailed to them. WMECO also includes information about our RDR on every customer bill envelope.
- At various times during the year WMECO includes information on the RDR in bill messages and other communications.
- WMECO is currently working on information for the Residential Assistance for Families in Transition ("RAFT") program to include in its outreach package. WMECO will be working to combine the RAFT program with NUSmart in order to provide further benefits and savings for our low income customers.
- WMECO includes the Residential Discount Rate information on a monthly basis in our customer communications, including bill inserts, on-bill messages, on-envelope messages and special inserts specifically sent to customers with payment in arrears.
- Energy Bucks (fuel assistance, utility discounts and weatherization services) Good Neighbor Energy Fund, information about the winter moratorium, and various other related energy programs and services for

income-eligible customers are also included throughout the year in customer communications. These programs and services, as well as the Residential Discount Rate information, are featured throughout the year in the region's daily and weekly newspapers, news magazines, television broadcasts and radio broadcasts.

- WMECO's web site offers information on the Residential Discount Rate.
- Yearly meetings are held with social service agencies and community based organizations.
- Outreach education folders are provided to customers and include: Energy Bucks (fuel assistance, weatherization services), 45 Ways to Use Energy Wisely (brochure) , bill insert on End of Standard Offer, Appliance Wheel, Mass Mutual's Life Bridge life insurance program, Citizen's Energy Oil Heat Program, Massachusetts Good Neighbor Energy Fund, information on free or low cost banking for low income customers in Massachusetts and various other information to assist low-income customers.
- Outreach information packets include information on Bay State Gas' discount rate, Verizon's Link-Up American and Lifeline (discount) services, a Lighting Conversion and Savings Chart (comparing the energy savings for changing out incandescent bulbs for CFL's), Understand Your WMECO Bill (bill insert), an appliance energy usage chart, survival center information, MassMutual's LifeBridge Life Insurance Program (free life insurance for low income families) and MassSave information (home energy audit for non-low income households).
- WMECO provides outreach education by talking with various groups within the jurisdiction of the Hampden County Sheriff's Department on a regular basis.
- WMECO works directly with School principals, superintendents, and directors of the school lunch programs within the 59 cities and towns served by WMECO. To simplify the process, WMECO accepts an award letter from the school district.
- WMECO has established relationships with a number of different agencies.
- Customers on the Residential Discount Rate receive a 32% reduction on their bills each month.
- WMECO participates in Energy Bucks – a unique collaboration between WMECO, other investor-owned utilities across the State, LEAN and MASSCAP – to help income-eligible families save on energy and energy costs.
- Good Neighbor Energy Fund – this emergency energy assistance program provides funding towards energy bills for families who are in financial difficulty but do not qualify for government aid. WMECO matches 50 cents on every dollar contributed by its customers to the Fund up to \$30,000.

Recertification Process

- Renewals are done through Government Agencies and Schools.
- Most re-certifications are done on a yearly basis.
- WMECO works with the DTA, to outreach, to enroll, and recertify eligible customers on the Residential Discount Rate program.
- Health benefits administered by the DMA are now verified by exchanging information via email to expedite the verification process.
- WMECO works closely with each of the four fuel assistance agencies, New England Farm Workers, Franklin Community Action, Berkshire Community Action, and Valley Opportunity Council, and Springfield Partners for Community Action (weatherization).
- Recipients of fuel assistance benefits up to 175% of the poverty level are enrolled in the Residential Discount Rate program. Customers' whose income is up to 60% of the state median income and exceeds 175% of the poverty level are informed of our Energy Savings Program for income-eligible customers.
- Only written verification from authorized employees of administering agencies and organizations is accepted as documentation that the customer of records receives an eligible benefit.
- Customers are asked to complete the Residential Discount Rate application form and provide the required proof of benefit listed on the application.
- If the customer is receiving fuel assistance, WMECO will work with the fuel assistance agency to obtain printed lists of fuel assistance recipients.
- Eligible benefits administered by the DTA receive notification of the availability of WMECO's Residential Discount Rate by mail. Notifications are mailed quarterly, (bimonthly in odd numbered months (e.g., January, March, May etc.)) to clients in WMECO service territory. Included with the notification is a preprinted form which serves as verification of the customer's status as a recipient of the benefits being

administered by DTA. A number code indicates which benefit is being received.

- Customers who receive Veterans Chapter 115 benefits submit a signed letter from the town's Veterans Agent on town letterhead stating that the client receives Chapter 115 benefits.
- For Veterans Non-Service Pension Program or DIC for Parents of Veterans, customers complete the Residential Discount Rate application and call 1-800-827-1000 for a signed letter on VA letterhead stating that the client receives the benefit.

Witness: Robert G. Johnston
Request from: Department of Telecommunications and Energy

Question:

Please provide a detailed explanation of how customers are recertified as eligible for the low-income discount rate each year under the traditional outreach process. How often does the recertification process occur? Are customers removed from the low-income discount rate until the customer confirms that he/she continues to be eligible for the low-income discount rate? If so, how are these customers tracked?

Response:

Yearly, WMECO provides a list of all customers receiving the discount rate to various agencies for verification (i.e., DTA Programs, DMA Programs, Public Housing, Mass Health, Mass Commission for the Blind, Head Start etc.,) Upon notification from the agencies that the customers are no longer eligible WMECO will remove the customers from the discounted rate. A letter is then sent to the customers informing them that if they still qualify for any assistance programs to send verification and they will be placed back on the low income rate. Customers remain on the discount rate until the recertification process occurs.

Recertification Process

- Renewals are done through Government Agencies and Schools.
- Most re-certifications are done on a yearly basis.
- WMECO works with the DTA, to outreach, to enroll, and recertify eligible customers on the Residential Discount Rate program.
- Health benefits administered by the DMA are now verified by exchanging information via email to expedite the verification process.
- WMECO works closely with each of the four fuel assistance agencies, New England Farm Workers, Franklin Community Action, Berkshire Community Action, and Valley Opportunity Council, and Springfield Partners for Community Action (weatherization).
- Recipients of fuel assistance benefits up to 175% of the poverty level are enrolled in the Residential Discount Rate program. Customers' whose income is up to 60% of the state median income and exceeds 175% of the poverty level are informed of our Energy Savings Program for income-eligible customers.
- Only written verification from authorized employees of administering agencies and organizations is accepted as documentation that the customer of records receives an eligible benefit.
- Customers are asked to complete the Residential Discount Rate application form and provide the required proof of benefit listed on the application.
- If the customer is receiving fuel assistance, WMECO will work with the fuel assistance agency to obtain printed lists of fuel assistance recipients.
- Eligible benefits administered by the DTA receive notification of the availability of WMECO's Residential Discount Rate by mail. Notifications are mailed quarterly, (bimonthly in odd numbered months (e.g., January, March, May etc.)) to clients in WMECO service territory. Included with the notification is a preprinted form which serves as verification of the customer's status as a recipient of the benefits being administered by DTA. A number code indicates which benefit is being received.

- Customers who receive Veterans Chapter 115 benefits submit a signed letter from the town's Veterans Agent on town letterhead stating that the client receives Chapter 115 benefits.
- For Veterans Non-Service Pension Program or DIC for Parents of Veterans, customers complete the Residential Discount Rate application and call 1-800-827-1000 for a signed letter on VA letterhead stating that the client receives the benefit.

Western Massachusetts Electric Company
Docket No. DTE 01-106

Information Request DTE-01
Dated: 09/02/2005
Q- DTE1-006
Page 1 of 1

Witness: Robert G. Johnston
Request from: Department of Telecommunications and Energy

Question:

Are customers that are located via traditional outreach methods enrolled on the low-income discount rate as of the date that they apply for the rate or as of the date that the application is confirmed or approved?

Response:

Customers are enrolled on the date the Company receives the notification from the agency or appropriate party of their eligibility..

Western Massachusetts Electric Company
Docket No. DTE 01-106

Information Request DTE-01
Dated: 09/02/2005
Q- DTE1-007
Page 1 of 42

Witness: Robert G. Johnston
Request from: Department of Telecommunications and Energy

Question:

Please provide copies of each report submitted to the Commonwealth of Massachusetts Division of Energy Resources, pursuant to G.L. c. 164, § 1F(4)(l), since March 1, 1998, regarding the company's "outreach activities and results."

Response:

See attached reports submitted to the Commonwealth of Massachusetts Division of Energy Resources for years 1999 through 2004.

09/08/2005 THU 15:22 FAX

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09/08/05 13:42 FAX 617 727 0030

DIV. OF ENERGY

002



Western Massachusetts
Electric

*Karin**- Vincent
cc: Joyce*

55 Russell Street, Hadley MA 01036

Western Massachusetts Electric Company
P.O. Box 670
Hadley, MA 01035-0670
(413) 585-1729

The Northeast Utilities System

January 15, 1999

Mr. David L. O'Connor
Commissioner
Division of Energy Resources
100 Cambridge Street, Room 150
Boston, MA 02202

Robin Yale Brown
General Manager - Hadley/Greenfield
Western Massachusetts Region

RE: Findings and Guidelines Regarding Low Income Discount Eligibility Verification

Dear Commissioner O'Connor:

I have attached WMECO's response concerning its plans for verifying customer eligibility and conducting outreach to its customers who are potentially eligible for the expanded discounted rate.

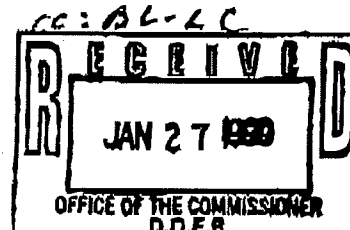
The plans we've developed are intended to maximize the possibility that every customer who is eligible receives the discount. We believe that the plans we have will make it as easy as possible to apply for and begin receiving the discounted rate. The guidelines provided by the Division of Energy Resources (DOER) are a very useful beginning to help with the effort to work with all agencies who serve potentially eligible customers. We intend to work within the framework outlined in the "Guidelines" and "Findings". Our goal, however, is to maximize participation and minimize the administrative burden placed on agencies and customers. To this end WMECO may develop procedures not mentioned here that will allow us to more completely achieve these goals.

Because there are several agencies with whom WMECO must make arrangements and enter agreements, we expect this process to continue through the first quarter of 1999. It is anticipated that we will be fully operational by the end of the first quarter. WMECO will provide a complete chronology of events and report on the results of its efforts in the report which is due to the DOER by June 1, 1999.

WMECO appreciates the efforts of DOER to bring together the stakeholders in this process and looks forward to continued cooperation with the DOER and all other interested parties.

If you have questions or would like additional information, please do not hesitate to contact me.

Sincerely,

W. Y. B.

FINDINGS AND GUIDELINES REGARDING LOW INCOME DISCOUNT ELIGIBILITY VERIFICATION

VERIFICATION OF ELIGIBILITY

1. The Western Massachusetts Electric Company has had an arrangement for nearly ten years with a Braintree, Mass. mailing house that sends notification to clients of the Department of Transitional Assistance. WMECO will seek to establish similar arrangements with agencies that administer the means tested benefits programs detailed in the "Findings" and "Guidelines" issued on December 14, 1998 by the Division of Energy Resources (DOER).

This arrangement will include bi-monthly mailings to new recipients of benefits who have been granted benefits since the last mailing. It will also be clear to customers that these mailings come from the granting agency and may include letters (or other forms of communication) from department or agency management. This is important to assure customers that the benefit granting agency has not shared confidential information with WMECO. When customers complete information on the pre-approved application they will also be asked to grant their permission to allow WMECO to discuss customer participation in the program with representatives of the granting agency. Customers will also be informed that it is their responsibility to notify WMECO when they no longer receive benefits.

2. WMECO believes that one or more administering agency may be unable or unwilling to provide the information necessary to work with a mailing house. An effective arrangement with a mailing house requires the ability to provide client information in an electronic format. In the event an agency is unable to provide this kind of information, WMECO will seek to establish an agreement with the agency whereby it can review information provided by recipients who complete an application provided by WMECO. Under this arrangement WMECO will send customer name, address and social security number to the agency for their verification of customer/client eligibility.
3. All customers will have the option of completing a company application for the discount. To enable this all agencies who administer qualifying benefits will have to agree to review information and to provide certification that the customer is an eligible recipient of program benefits. WMECO will begin applying the discount as soon as it receives notification from the appropriate agency.
4. WMECO is sensitive to the concern that the efforts required to verify and recertify eligibility may add to agency workloads. WMECO will work individually with each granting agency to ensure that additional work loads are minimized to the greatest extent possible and that all agency clients are served in a timely manner. This may require arrangements that differ slightly from guidelines set forth in the December 14 letter. It is not possible at this time to speculate on how arrangements may differ, but WMECO will provide a full accounting of all activities in its report due to the DOER by June 1, 1999.

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DIV. OF ENERGY

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FINDINGS AND GUIDELINES REGARDING LOW INCOME DISCOUNT ELIGIBILITY VERIFICATION

RECERTIFICATION

WMECO will annually provide information in electronic format (or in a format requested by the agency in question) to administering agencies for the purpose of determining continued customer eligibility for the discounted rate. WMECO will not remove the customer from the discounted rate without notification from the administering agency that the customer no longer receives the means tested benefit. WMECO will notify the customer that the discounted rate is being discontinued based on information provided by the agency that the customer no longer receives benefits. WMECO will include with this letter an explanation of the eligibility guidelines for the discounted rate and provide an application form.

OUTREACH

1. WMECO is in the process of printing a new application which includes new information about the expanded eligibility for WMECO's discounted rate. As soon as the applications are ready they will be offered to approximately 800 organizations, community groups and agencies that may serve low income and/or elderly people for possible distribution to their clients. This offer will be included with Help Notes, a newsletter mailed three times a year to these groups. In addition WMECO will follow up with key local agencies and organizations to inquire about their interest in making applications available to potentially eligible customers. In addition sufficient quantities will be made available to the Department of Revenue for use in their own outreach activities.
2. WMECO is presently in the process of redesigning the financial hardship form to include information about the discounted rate. The forms are typically reprinted in the first quarter of each year after federal poverty guidelines are revised for the year. WMECO will include the revisions in its next printing and insert them in bills as soon as they are available.
3. Billing envelopes will be printed to reflect the requirements set forth in the "Guidelines." WMECO will use current stocks of envelopes and make the changes upon the next printing of envelopes.
4. Applications will be made available through display posters that will be placed with agencies who feel that they are appropriate for use in their service areas. In addition to governmental agencies, WMECO will offer these poster displays to other agencies and organizations that may have the opportunity to serve clientele who may be eligible for a discounted rate.

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**FINDINGS AND GUIDELINES REGARDING
LOW INCOME DISCOUNT ELIGIBILITY VERIFICATION**

5. WMECO will notify schools and children's camps about the expanded discount rate and provide them with information about eligibility guidelines. Schools and camps will be offered the ability to make applications available to the households through the children.
6. In addition to outreach through agencies and information included with bills, WMECO will provide discount rate information in special mailings to delinquent customers near the end of the winter moratorium and in advance of the closing of the LIHEAP program. Each year WMECO conducts special mailings to delinquent customers advising them of the availability of home heating assistance. Beginning with the 1999 mailing WMECO will include information about and applications for its discounted rates.

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**Western Massachusetts
Electric**

March 31, 1999

Mr. Vincent DeVito
Deputy General Counsel
Commonwealth of Massachusetts
Office of Consumer Affairs
Division of Energy Resources
100 Cambridge Street, Room 1500
Boston, MA 02202

55 Russell Street, Hadley MA 01035

Western Massachusetts Electric Company
P.O. Box 670
Hadley, MA 01035-0670
(413) 585-1729

The Northeast Utilities System

Robin Yale Brown
General Manager - Hadley/Greenfield
Western Massachusetts Region

Dear Mr. DeVito:

Thank you for your letter of conditional acceptance of our plan to comply with the Guidelines issued by the Division of Energy Resources (DOER). I am pleased to offer the following information in an attempt to clarify our plans and to receive your full acceptance of our overall plans.

Item 1 Department of Revenue - Information and Applications

WMECO is currently completing its update of applications for the discounted rate. New applications will contain the latest information on eligible categories and the latest monthly and annual gross income figures that specify income guidelines for 175% of the federal poverty level.

It is WMECO's plan to provide sufficient quantities to the Department of Revenue (DOR) for mailing to potentially eligible residents in WMECO's service territory. Applications are designed to be self explanatory and are returnable directly to WMECO. DOR may include the applications in mailings that are already scheduled or may elect to accept our offer to cover the mailing and other costs associated with a special mailing. Though WMECO has not yet reached agreement with DOR we anticipate reaching agreement with them and completing a mailing prior to the end of the second quarter and annually thereafter.

Item 4 Quarterly Bill Notifications

Quarterly notification will begin in the second quarter of 1999 with a separate insert and/or a special article in WMECO's "Consumer News" bill insert. In addition, WMECO will print a message on the bill informing customers of the article and the availability of the discounted rate. The message will appear in language similar to the following: "Please be sure to read Consumer News for information on the availability of a special discounted rate." These articles and/or inserts will appear during the second and third quarters of each year.

During the third and fourth quarters WMECO normally includes statements on "Guidelines for Financial Hardship" with every bill. These statements are currently being revised to include information about the discounted rate. Special messages on the billing statement, drawing attention to the information, will also be printed on the bill.

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Item 5 Point of Purchase Displays

WMECO has not completed plans on point of purchase displays. Though we have committed to producing them, our plans will be finalized in the coming weeks with completion of the new application form.

However, WMECO has identified the following agencies as targets for providing point of purchase displays.

- Department of Transitional Assistance
- Department of Employment and Training
- Massachusetts Health Enrollment Center (Division of Medical Assistance)
- Mental Health Department
- Public Health Department
- Registry of Motor Vehicles
- Department of Social Services
- Social Security Administration
- Local Town/City Halls
- Senior Citizen Centers
- Offices of Elder Service Agencies
- Community Action Agencies
- Red Cross
- Salvation Army
- Information and Referral Agencies

The list comprises those agencies which we would anticipate locating displays. Displays will be produced in sufficient quantities so that they can be offered to all agencies who may provide a point of contact with the potentially eligible population.

Item 7 Cash Register Receipt Information

WMECO is participating in discussions with other Massachusetts distribution companies concerning the feasibility of placing information on cash register tapes. This issue will be raised at the next meeting of the Consumer Education Panel scheduled for April 13, 1999.

These clarifications are provided in an effort to assure the DOER that WMECO intends to fully comply with Guidelines that have been issued. Please do not hesitate to contact me if you need further information about these items or if you have questions about the response.

Sincerely,



cc: Claudine Langlois, Director,
Consumer Division, DTE

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Western Massachusetts
Electric

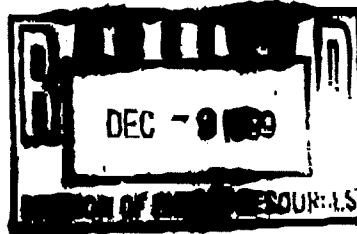
174 Brush Hill Avenue, W. Springfield, MA 01090

Western Massachusetts Electric Company
P.O. Box 2010
West Springfield, MA 01090-2010
(413) 783-3871
Fax (413) 787-9352

The Northeast Utilities System

December 6, 1999

Mr. David L. O'Connor
Commissioner
Division of Energy Resources
100 Cambridge Street, Room 1500
Boston, MA 02202



Re: Status of WMECO's Outreach Efforts for Residential Discount Rate

Dear Commissioner:

In late August 1999, I assumed responsibility for the outreach efforts of Western Massachusetts Electric Company's (WMECO's) Residential Discounted Rate Program.

Because of the transition, I thought I should summarize for you the actions taken to date by WMECO to comply with the outreach and eligibility verification requirements for this discount. The following information recaps and updates the status WMECO's outreach and eligibility verification of customers who are potentially eligible for the expanded residential discounted rate. The actions WMECO has taken are as follows:

1. WMECO continues to work with Allison Bowen of the Department of Transitional Assistance (DTA) to outreach to, inform, enroll, and recertify eligible customers in the discounted rate program. This process is outlined in item 1 of the attached document entitled "Findings and Guidelines Regarding Low Income Discount Eligibility Verification" (WMECO's "Plan").
2. WMECO also continues to work with the area's fuel assistance agencies to identify those customers of WMECO who are recipients of fuel assistance benefits and enroll them in the discounted rate program.
3. Until recently, outreach to senior citizens who may be eligible for WMECO's discounted rate by virtue of their participation in the Senior Pharmacy Program has been conducted through the various Councils on Aging and other senior organizations serving our communities. With the recent change to the income guidelines of the program to 188% of poverty, WMECO faces the additional challenge of income verification. We have contacted the State Office of Elder Affairs to seek their assistance in establishing a verification arrangement similar

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to that which is utilized with the DTA; however, due to the tremendous workload that office presently faces in processing applications as a result of the new income guidelines, they will be unable to assist us in implementing such an arrangement with us until some time in the Spring of 2000. Therefore, WMECO is exploring other methods of income verification as part of the application process.

4. WMECO has contacted each of the superintendents of the school districts in the 59 communities we serve, asking their assistance in distributing discount rate applications to the families of those children who are eligible for the National School Breakfast and Lunch Program.

Although we have made considerable efforts to identify the appropriate agency through which we might work to verify program eligibility in a more efficient manner, we have been unable to locate a single point of contact. This is something we will continue to pursue because it has come to our attention that all children in the Springfield School System are being granted this benefit whether or not they are income eligible. This means that we will be unable to rely solely on participation in the program as proof that the customer is income eligible. As with the Senior Pharmacy Program, WMECO is exploring methods of income verification as part of the application process so as not to unduly burden customers or create an administrative burden for the Company.

5. Annually, WMECO hosts a meeting for the social agencies in each of its districts to explain its current programs including the residential discounted rate, and seeks their assistance in outreach and income verification. This year, social agency meetings were held as follows:

<u>District</u>	<u>Date</u>
Pittsfield	October 26, 1999
Hadley/Greenfield	October 27, 1999
Springfield	November 5, 1999

At each meeting, agencies were provided with discounted rate posters to display in their offices in order to increase visibility of the program to their clientele.

We are currently striving to have the fliers translated into Spanish, Vietnamese, Russian, and Cambodian to ensure outreach to those customers who may not use English as their primary language. In addition to the flier, WMECO is having "point of purchase" displays produced for distribution to the agencies listed in Robin Brown's letter dated March 31, 1999, to Vincent DeVito. We expect to have these displays in place the first quarter of 2000. They will be distributed with copies of the revised applications as stated in item 6 below.

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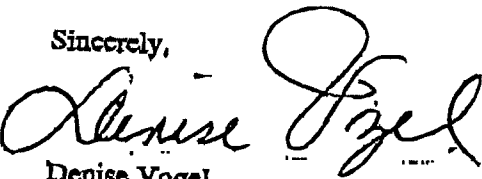
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6. WMECO has revised the Residential Discounted Rate Application to include expanded eligibility. It is in the process of again revising the application to include additional information about supporting documentation and income verification.
7. In an earlier response by WMECO, we indicated that we would first exhaust our supply of billing envelopes before having new ones made with the required message indicating that discounted rate information is enclosed with our monthly bill. We are, however, exploring the possibility of using a postal indicia on existing billing envelopes. If this appears to be feasible, we will implement the billing envelope message before our current supply of billing envelopes run out.
8. The Financial Hardship Form has been revised to include information about the discounted rate.
9. WMECO has implemented a process to include information about the discounted rate in customer bills each quarter. Each time information is included in the bill, WMECO will also include an "on-bill" message indicating the information has been included.
10. Information about the discounted rate has also been included in NU Neighbors and HelpLine, two publications prepared for distribution to senior citizens and customers with limited incomes. WMECO has also conducted a number of informational meetings for senior citizens and limited income customers. Additional meetings of this nature are scheduled as a result of referrals from our Social Agencies and efforts to target customer groups which are difficult to reach. WMECO's goal is to work with area social agencies not only to spread the word about its discounted rate, but to raise customer awareness of eligibility for other services that may be available to them such as energy savings programs.

I hope this information is helpful. If you have any questions or need clarification of any item, please call me at (413) 787-9011.

Thank you.

Sincerely,



Denise Vogel
Manager, Community Relations
and Communications

SEP-12-2005 MON 10:52 AM WMECO/NU
09/09/2005 THU 18:22 FAX

FAX NO. 617 345 1148

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Attachment

c: Claudino Langlois - DTE
Karin Pisiewski - DOER
Stanley Wsciolowski - DOER

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SUMMARY OF WMECO OUTREACH ACTIVITIES
Yearend Report to Department of Energy Resources
December 2000

Western Massachusetts Electric Company ("WMECO") has been conducting ongoing outreach to low-income customers in response to G.L.c.164, sec.1F(4)(I). Efforts over the past year are as follows:

1. The Residential Discount Rate application form has been completely updated and revised to improve readability and to provide customers with the information they need to expedite processing of their applications. The form lists the means-tested programs that qualify them for the rate, the documentation that WMECO will accept as proof that the customer is a recipient of each means-tested program, and a chart of the income guidelines.

Because WMECO must revise its residential discount rate application to reflect changes in the names of and/or guidelines for means-tested programs that qualify a customer for the rate, the application now carries a date on the front indicating the latest printing of the form in order to minimize confusion for customers. We expect shipment of new applications the week of November 20, 2000. At that time, we will mail a supply of applications to all Point of Sale Display holders (see item 7 below), asking them to replace their existing supply with the new forms.

2. WMECO has completely updated and revised its financial hardship form to improve readability. In addition to providing customers with the Financial Hardship Statement they must complete in order to qualify for protection, the new form entitled, *WMECO SHUTOFF PROTECTION And Residential Discount Rate Information*, uses a question and answer format to help customers understand who is eligible, how they will know if they are eligible, and what to do if their application for protection is denied. The form also provides information on the Residential Discount Rate.

This form was most recently enclosed with customer bills in October/November and will again be enclosed in January statements.

3. Four times each year, WMECO includes information on the Residential Discount Rate in its Consumer News insert. Whenever this information appears in the insert, WMECO displays an on-bill message drawing in an effort to draw the customers' attention to this information.

4. A new billing envelope has been designed that indicates information about our residential discount rate is available on our web site. Although we recognize that not all customers have computers and/or access to the Internet, we felt that the message would generate interest and possibly encourage customers who do not have Internet access to contact us by telephone. We hope to begin using the new envelope in February.
5. Information about the Residential Discount Rate is also available on WMECO's web site so that agencies or customers with computer access can obtain information about eligibility criteria. A copy of the application can also be downloaded and printed.
6. Each year, meetings are held with social agencies serving WMECO's customers throughout western Massachusetts. This year's meetings were held on November 1 in West Springfield for agencies serving Springfield District, on November 7 in Amherst for agencies serving the Hadley/Greenfield District, and on November 14 in Pittsfield for agencies serving our towns throughout the Berkshires.

Financial hardship coding, the Residential Discount Rate, the Energy Savings Program, Good Neighbor Energy Fund, the Governor's Hotline for energy information, information about the winter moratorium, and various other related energy programs and services for income-eligible customers were major topics of discussion.

In addition, the meetings are an appropriate forum to request the support of the 150 agencies, legislators, town officials who are invited in spreading information about our discount rate and various other programs and services to their clients and constituents who are customers of WMECO.

7. Point of Sale Displays for our Residential Discount Rate applications have been designed and have been placed in 62 agencies serving residents of western Massachusetts as listed on the attached Distribution List. These displays were distributed in face-to-face meetings with groups or individuals to introduce or provide an update of WMECO's residential discount rate. In many cases, such as Head Start, The Salvation Army, etc., the discussion sought ways to improve outreach/verification of eligibility for recipients of certain means-tested programs.
8. Fliers about the WMECO Residential Discount Rate have been developed in English, Spanish, and Russian, and a contact has been identified to translate the flier into Cambodian and Vietnamese. These fliers were shared with all attendees at the recent Social Agency meetings held by WMECO in Amherst, Pittsfield, and West Springfield. They will also be distributed to various agencies throughout our service territory during

the first quarter of 2001.

9. WMECO continues to work with Allison Bowen of the Department of Transitional Assistance (“DTA”) to outreach to, inform, enroll, and recertify eligible customers in the residential discount rate program.
10. WMECO works closely with each of the four fuel assistance agencies [New England Farm Workers (“NEFWC”), Franklin Community Action (“FCAC”), Berkshire Community Action (“BCAC”), and Valley Opportunity Council (“VOC”)] in western Massachusetts to identify those customers of WMECO who are recipients of fuel assistance benefits at 175% of poverty and enroll them in the residential discount rate program.

This process is currently manual, but efforts are underway to put into place an electronic data exchange between the fuel assistance agencies and WMECO.

In addition, WMECO is working with the four agencies to capture those customers whose income exceeds 175% so that we can outreach to them for our Energy Savings Program for income-eligible customers.

11. WMECO has made substantial strides in reaching customers of record whose children are recipients of the National School Breakfast/Lunch program by working directly with the school principals, superintendents, and directors of the school lunch program within the 59 towns and communities we serve.

At the beginning of the school year, letters went out to 100 principals asking their support in sending information to parents about our program. To simplify the process, we developed and sent to each principal a form letter customers could complete and return to the schools giving them permission to verify eligibility for the Residential Discount Rate if they are approved for the National School Breakfast/Lunch program and meet our income eligibility levels.

Ideally, we will do this mailing in August just before the school does its recertification of the School Breakfast/Lunch program so that the materials to minimize processing effort by the schools. We are also updating our data base using the State’s directory to ensure that this mailing will go to all principals in the towns/cities we serve.

12. WMECO met with the Executive Office of Elder Affairs to discuss outreach to seniors and was told that the program that is eligible for the Residential Discount Rate at 175% of poverty is The PHARMACY Program – not The Senior Pharmacy Program. We were also told that the program card seniors use for pharmaceuticals is used for all the pharmacy

programs which are at various levels of income. Finally, we were told that The PHARMACY Program is expected to change in April of 2001 at which time an insurance program that covers all income levels will be put in its place, making outreach even more difficult than it is today.

As a result of these discussions, WMECO met with the executive officers of Western Massachusetts Association of Councils on Aging (“WMACA”) to discuss how we might better reach seniors who are both recipients of The PHARMACY Program and financially eligible for our discount rate. A decision was made to develop a form similar to that used by the schools and to utilize the existing network of social workers to verify income levels for seniors who are recipients of The PHARMACY Program benefit. Subsequent to this meeting, WMECO made a presentation at the Annual Meeting of WMACA about the Residential Discount Rate and sought the support of all the Councils serving western Massachusetts. The request was well received. We are currently working with the Councils to implement this approach and expect it to be a success.

13. Meetings have been held with representatives of and Point of Sales Displays have been provided to Head Start organizations in an effort to increase outreach to customers whose children are enrolled in this program. We have established a similar process of verification of eligibility for the Residential Discount Rate for the Head Start organization serving the Springfield area and will continue to work toward expanding this process to other Head Start organizations.
14. Information about the residential discount rate has been included in Neighbors, our publication for senior citizens, and HelpLine, our publication for low-income customers. These publications are produced three times a year (winter, spring/summer, and fall). We send Neighbors to all customers who are coded “65” or who have asked to be included on the distribution list for this newsletter. We send HelpLine to all customers who are coded financial hardship.

Both newsletters are also included in the packets of information we put together for our social agency meetings.
15. WMECO is invited to speak before various customer and community groups throughout the year. Where appropriate, information about the Residential Discount Rate and related programs and services is included.
16. Plans are underway to set up a meeting with representatives of the Veterans Administration and of Public and Subsidized Housing to explore opportunities to streamline the Residential Discount Rate verification process for recipients of these programs.

17. We have provided financial support to the Mass 211 initiative in an effort to help this new Information and Referral system into place. The new Mass 211 directory, which replaces WMECO's booklet entitled, Programs that Help People in Western Massachusetts, is an outcome of this support and an attempt to provide a more comprehensive directory of programs, services, and other resources – including WMECO's Residential Discount Rate – which are available to residents of western Massachusetts. The directory itself is a desk reference copy for social workers and agency personnel. This new directory was introduced at the Company's annual social agency meetings held in November.
18. We have made arrangements with Kathy Jones of the Massachusetts Division of Medical Assistance (DMA) to streamline recertification of those WMECO customers who have received the Residential Discount Rate because of their eligibility for MassHealth through DMA. The process we use will be similar in manner to that currently in place with the Department of Transitional Assistance.

Attachment: List of Point of Sale Display Recipients

SUMMARY OF WMECO OUTREACH ACTIVITIES
Yearend Report to the Division of Energy Resources
December 2001

Western Massachusetts Electric Company ("WMECO") has been conducting ongoing outreach to low-income customers in response to G.L.c.164, sec.1F(4)(I). Efforts over the past year are as follows:

1. The Residential Discount Rate application form has been completely updated and revised to improve readability and to provide customers with the information they need to expedite processing of their applications. The form lists the means-tested programs that qualify them for the rate, the documentation that WMECO will accept as proof that the customer is a recipient of each means-tested program, and a chart of the income guidelines.

WMECO must revise its residential discount rate application to reflect changes in the names of and/or guidelines for means-tested programs that qualify a customer for the rate. The English and Spanish versions of the current application do not carry a date on the front. The date was left off in error and will be corrected for the next printing.

2. Four times each year, WMECO includes information on the Residential Discount Rate in its Consumer News insert. Whenever this information appears in the insert, WMECO displays an on-bill message in an effort to draw the customers' attention to this information.

Information about the Residential Discount Rate is also available on WMECO's web site so that agencies or customers with computer access can obtain information about eligibility criteria. A copy of the application can also be downloaded and printed.

3. Each year, meetings are held with social agencies serving WMECO's customers throughout western Massachusetts. This year's meetings were held on October 24 in West Springfield for agencies serving Springfield District, on October 30 in Greenfield for agencies serving the Hadley/

Greenfield District, and on November 1 in Pittsfield for agencies serving our towns throughout the Berkshires.

Financial hardship coding, the Residential Discount Rate, the Energy Savings Program, Good Neighbor Energy Fund, information about the winter moratorium, deregulation and various other related energy programs and services for income-eligible customers were major topics of discussion.

In addition, the meetings are an appropriate forum to request the support of the 150 agencies, legislators, town officials who are invited in spreading information about our discount rate and various other programs and services to their clients and constituents who are customers of WMECO.

4. Point of Sale Displays (POS) for our Residential Discount Rate applications have been redesigned to advertise the Residential Discount Rate instead of the 35% discount on the previous displays. The new POS displays will replace the ones that were distributed last year to 62 agencies serving residents of western Massachusetts. Additional displays will be distributed throughout the WMECO's service territory starting in January. The displays will be distributed in face-to-face meetings with groups or individuals to introduce or provide an update of WMECO's residential discount rate.

5. Arrangements are being worked out to have local contacts translate Residential Discount Rate applications into Russian, Vietnamese, and Portuguese and to update and print new applications as information changes. Last year, a Russian application was produced, but could not be updated with in-house software.

6. WMECO continues to work with Don Johnson of the Department of Transitional Assistance ("DTA") to outreach to, inform, enroll, and recertify eligible customers in the residential discount rate program.

7. WMECO works closely with each of the four fuel assistance agencies [New England Farm Workers ("NEFWC"), Franklin Community Action ("FCAC"), Berkshire Community Action ("BCAC"), and Valley Opportunity Council ("VOC")] in western Massachusetts to identify those customers of WMECO who are recipients of fuel assistance benefits at 175% of poverty and enroll them in the residential discount rate program.

8. WMECO continues to streamline methods of verification for customers applying for the Residential Discount Rate. For MassHealth benefits administered by the Division of Medical Assistance and the Department of Transitional Assistance, benefits are now verified electronically.

Arrangements are being worked on to verify Fuel Assistance information electronically as well.

In addition, WMECO is working with the four agencies to capture those customers whose income exceeds 175% so that we can outreach to them for our Energy Savings Program for income-eligible customers.

9. WMECO has made substantial strides in reaching customers of record whose children are recipients of the National School Breakfast/Lunch program by working directly with the school principals, superintendents, and directors of the school lunch program within the 59 towns and communities we serve.

At the beginning of the school year, letters went out to 100 principals asking their support in sending information to parents about our program. To simplify the process, we developed and sent to each principal a form letter customers could complete and return to the schools giving them permission to verify eligibility for the Residential Discount Rate if they are approved for the National School Breakfast/Lunch program and meet our income eligibility levels.

This mailing was done in mid-July, just before the school does its recertification of the School Breakfast/Lunch program so that the materials to minimize processing effort by the schools. We are also updating our database using the State's directory to ensure that this mailing will go to all principals in the towns/cities we serve.

10. Since The PHARMACY Program has been discontinued and has not been replaced by a means tested program, there has been confusion for some of WMECO's elderly customers. WMECO continues to encourage elderly customers to apply for the Residential Discount Rate under any other qualifying benefit they may receive.

11. Information about the residential discount rate has been included in Neighbors, our publication for senior citizens, and HelpLine, our publication for low-income customers. These publications are produced three times a

year (winter, spring/summer, and fall). We send Neighbors to all customers who are coded "65" or who have asked to be included on the distribution list for this newsletter. We send HelpLine to all customers who are coded financial hardship.

Both newsletters are also included in the packets of information we put together for our social agency meetings.

12. WMECO is invited to speak before various customer and community groups throughout the year. Where appropriate, information about the Residential Discount Rate and related programs and services is included.

13. Meetings with representatives of the Veterans Administration and of Public and Subsidized Housing were held to explore opportunities to streamline the Residential Discount Rate verification process for recipients of these programs.

WMECO distributed information packets on the Residential Discount Rate at a statewide Veterans Agent recertification conference on September 19, in Milford.

14. The Mass 211 Gateway book, which replaced Programs that Help People in Western Massachusetts, is requested frequently. The directory itself is a desk reference copy for social workers and agency personnel. Mass 211 is also available on WMECO's web site.

15. WMECO met with the Springfield Housing Authority to outreach to the housing residents. The housing authority has approximately 2200 residents in various locations throughout the city. Point of Sale displays will be located in rental offices and brochure racks will be available in community rooms. Educational materials will include brochures on Heat Stress, Hypothermia, Home Safety, Home Security and 45 Ways to Use Energy Wisely. Residential Discount Rate applications will also be available.

16. Energy Bingo is our most popular outreach to seniors. Game winners receive energy efficient prizes and each bingo square matches up with a conservation tip. The most popular senior outreach is Senator Brian Lees "Golden Gathering" held each August at Western New England College in Springfield. Two sessions of Energy Bingo are held. The Golden Gathering

draws approximately 1,500 seniors. In between games, the Residential Discount Rate, deregulation and other relevant topics are discussed.

17. WMECO is working with the Hampden County Sheriff's Department at the Community Safety Center in Springfield to assist clients in the After Incarceration Program. WMECO will speak with various groups (women's group, Hispanic men's group, etc.) approximately every three months to reach clients who are completing the program. The discussion includes the Residential Discount Rate, energy saving measures, WMECO's Energy Savings Program, Good Neighbor Energy Fund and various topics to make our programs and services available.

December 31, 2002

Ms. Karin Pisiewski
Public Information
Division of Energy Resources
70 Franklin Street 7th Floor
Boston MA 02110-1313

Re: Status of WMECO's Outreach Efforts for Residential Discount Rate

Dear Karin:

Western Massachusetts Electric Company ("WMECO") has been conducting ongoing outreach to low-income customers in response to G.L.c.164, sec.1F(4)(I) as well as DTE 01-106. Efforts over the past year are as follows:

1. The Residential Discount Rate application form has been updated and revised to improve readability and to provide customers with the information they need to expedite processing of their applications. The form lists the means-tested programs that qualify them for the rate, the documentation that WMECO will accept as proof that the customer is a recipient of each means-tested program, and a chart of the income guidelines.

WMECO must revise its Residential Discount Rate application to reflect changes in the names of and/or guidelines for means-tested programs that qualify a customer for the rate. The English and Spanish versions of the current application have the date they are printed on the front of the application. These applications are also available on WMECO's web site at www.wmeco.com and can be downloaded and printed.

2. WMECO included the Residential Discount Rate information on a monthly basis in our customer communications, including bill inserts, on-bill messages, on-envelope messages and special inserts specifically sent to customers with payment in arrears.

The Energy Savings Program, Good Neighbor Energy Fund, information about the winter moratorium, and various other related energy programs and services for income-eligible customers were also included throughout the year in customer communications. These programs and services, as well as the Residential Discount Rate information, were also featured throughout the year in the region's daily and weekly newspapers, newsmagazines, television broadcasts and radio broadcasts.

3. Each year, meetings are held with social agencies serving WMECO's customers throughout western Massachusetts. This year's meetings were held on October 25, in Pittsfield for agencies serving our communities in the Pittsfield District; on November 6, in West Springfield for agencies serving our communities in the Springfield District; and on November 12 in Hadley for agencies serving our communities in the Hadley/Greenfield District.

Financial hardship coding, the Residential Discount Rate, the Energy Savings Program, Good Neighbor Energy Fund, information about the winter moratorium, deregulation and various other related energy programs and services for income-eligible customers were major topics of discussion.

In addition, the meetings are an appropriate forum to request the support of the 150 agencies, legislators, town officials who are invited in spreading information about our Residential Discount Rate and various other programs and services to their clients and constituents who are customers of WMECO.

4. Redesigned Point of Sale Displays (POS) for our Residential Discount Rate applications continue to be distributed throughout the WMECO service territory. Over 75 old displays were replaced with new ones and approximately 25 new locations were added as well. The displays are distributed in face-to-face meetings with community groups, non-profit

organizations and individuals to introduce or provide an update of WMECO's Residential Discount Rate.

5. In January, 2002, WMECO initiated a process to study how best to identify low income customers and determine the best way to reach this group. WMECO contracted with nationally known consultant, Mark Wolfe of Eastham Associates, who is also the Executive Director of NEADA (National Energy Assistance Directors Association) to do the study. We presented our plan to other utilities in Massachusetts and invited them to participate in the study. With their participation, the study became a state-wide study. We expect the results to be published during the Winter, 2003. The study will identify the low income customers and strategies will be recommended to better reach these customers. WMECO will expand our outreach efforts to encompass the study recommendations as appropriate.

6. WMECO continues to work with Don Johnson of the Department of Transitional Assistance ("DTA") to outreach to, inform, enroll, and recertify eligible customers in the Residential Discount Rate program.

7. WMECO works closely with each of the four fuel assistance agencies [New England Farm Workers ("NEFWC"), Franklin Community Action ("FCAC"), Berkshire Community Action ("BCAC"), and Valley Opportunity Council ("VOC")] in western Massachusetts to identify those customers of WMECO who are recipients of fuel assistance benefits at 175% of poverty and enroll them in the Residential Discount Rate program.

8. WMECO continues to streamline methods of verification for customers applying for the Residential Discount Rate. For MassHealth benefits administered by the Division of Medical Assistance and the Department of Transitional Assistance, benefits are now verified electronically.

WMECO identified New England Farm Workers Council (NEFW) as the largest agency with WMECO fuel assistance customers. We met with Pat Nelligan of NEFW regarding their electronic infrastructure. Further discussions were held with WMECO's Information Technology group and NEFW's system provider. We will continue going forward with efforts in

2003 to streamline an electronic data transfer system. These efforts may include purchasing mutually compatible software.

In addition, WMECO is working with the four agencies to capture those customers whose income exceeds 175% so that we can outreach to them for our Energy Savings Program for income-eligible customers.

9. WMECO has made substantial strides in reaching customers of record whose children are recipients of the National School Breakfast/Lunch program. This summer, WMECO met with Springfield School Superintendent Joseph Burke and members of the Springfield School Department, including Tom Mazza, to develop a pilot program focusing efforts on enrolling the families of the approximately 15,000 free lunch students. We worked together to develop a letter/application for the families who receive the free school lunch benefit to qualify for WMECO's Residential Discount Rate. The Springfield School Department has agreed to work closely with school principals to ensure that the application process is delivered in a timely fashion. We will evaluate the impact of the pilot program in increasing the number of families enrolling in the Residential Discount Rate through the free school lunch benefit. WMECO will expand this focused approach to other communities for the next school year.

10. WMECO is invited to speak before various customer and community groups throughout the year. Discussions always include information about the Residential Discount Rate, Energy Savings Program, Good Neighbor Energy Fund, Special Accounts Group (to help customers with billing in arrears) and weatherization programs and services. These opportunities are our best form of outreach, especially for our elderly customers. Many people feel comforted that they can speak with a company representative face to face to receive the assistance they need.

11. As of December 12, the following figures are available for WMECO's web site (www.wmeco.com): the Residential Discount Rate page received 2,537 visitors this year. Mass211 Gateway, which replaced Programs that Help People in Western Massachusetts was downloaded 2,075 times. The Residential Discount Rate application was downloaded 1,458 times and the specific DTE rate page was downloaded 461 times. Both Neighbors and

HelpLine are on the web and their total downloads was over 2,500. Neighbors is distributed to 10,000 customers and HelpLine is distributed to approximately 6,000 customers. Both publications are also printed in Spanish.

13. Energy Bingo is our most popular outreach to seniors. Game winners receive energy efficient prizes and each bingo square matches up with a conservation tip. The most popular senior outreach event is Senator Brian Lees "Golden Gathering" held each August at Western New England College in Springfield. Two sessions of Energy Bingo are held. The Golden Gathering draws approximately 2,000 seniors. In between games, we present information for discussion regarding the Residential Discount Rate, weatherization services, Good Neighbor Energy Fund, deregulation and other relevant topics. Energy Bingo is held upon request at various locations throughout WMECO's service territory.

14. WMECO continues to work with the Hampden County Sheriff's Department at the Community Safety Center in Springfield to assist clients in the After Incarceration Program. The Sheriff's Department has combined their men's and women's groups. A WMECO representative speaks with these groups on an as needed basis to reach clients who are completing the program to ensure that they are made aware of the benefits available. The discussion includes the Residential Discount Rate, energy saving measures, WMECO's Energy Savings Program, Good Neighbor Energy Fund and various topics to make our programs and services available. WMECO made three presentations at the Community Safety Center in 2002, with an average of 20-25 clients in each session.

15. In July, 2002, WMECO streamlined an option for customers to view their own account information on the WMECO web page. Customers who do not have web access and/or customers applying for assistance can bring the required information to a community action agency and give an agency representative permission to access their account information. This information can help the customer qualify to receive benefits.

16. WMECO actively participates in statewide groups that are dedicated to improving the availability of programs and services to income eligible customers. Some of these groups include LIHEAP, Good Neighbor Energy

Fund, the Energy Benefits Task Force, and the DOER Consumer Education Task Force.

17. In summary, WMECO has increased the number of customers enrolled in the Residential Discount Rate, while working with local, regional and statewide organizations. We look forward to continuing and improving our efforts to reach all of our eligible customers.

I hope this information is helpful. If you have any questions or need clarification of any item, please call me at 413-787-9206.

Thank you.

Sincerely,

Kathleen T. Agin
Community Outreach Representative

December 31, 2003

Ms. Karin Pisiewski
Consumer Affairs Coordinator
Division of Energy Resources
70 Franklin Street 7th Floor
Boston MA 02110-1313

Re: Status of WMECO's Outreach Efforts for Residential Discount Rate

Dear Karin:

Western Massachusetts Electric Company ("WMECO") has been conducting ongoing outreach to low-income customers in response to G.L.c.164, sec.1F(4)(I) as well as DTE 01-106. Efforts over the past year are as follows:

1. The Residential Discount Rate application form has been updated and revised to improve readability and to provide customers with the information they need to expedite processing of their applications. The form lists the means-tested programs that qualify them for the rate, the documentation that WMECO will accept as proof that the customer is a recipient of each means-tested program, and a chart of the income guidelines.

WMECO must revise its Residential Discount Rate application to reflect changes in the names of and/or guidelines for means-tested programs that qualify a customer for the rate. The English and Spanish versions of the current application have the date they are printed on the front of the application. These applications are also available on WMECO's web site at www.wmeco.com and can be downloaded and printed.

Translation of the Residential Discount Rate application into Vietnamese and Russian is being explored for the next application revision.

2. WMECO included the Residential Discount Rate information on a monthly basis in our customer communications, including bill inserts, on-bill messages, on-envelope messages and special inserts specifically sent to customers with payment in arrears.

The Energy Savings Program, Good Neighbor Energy Fund, information about the winter moratorium, and various other related energy programs and services for income-eligible customers were also included throughout the year in customer communications. These programs and services, as well as the Residential Discount Rate information, were also featured throughout the year in the region's daily and weekly newspapers, newsmagazines, television broadcasts and radio broadcasts.

In 2003, WMECO produced a SmartLiving catalog (energy efficient products) exclusively for WMECO customers. A special section detailed the programs and services available to income eligible WMECO customers.

3. Each year, meetings are held with social agencies serving WMECO's customers throughout western Massachusetts. This year's meetings were held on October 15, in Pittsfield for agencies serving our communities in the Pittsfield District; on October 16, in West Springfield for agencies serving our communities in the Springfield District; and on October 17, in Hadley for agencies serving our communities in the Hadley/Greenfield District.

Financial hardship coding, the Residential Discount Rate, the Energy Savings Program, Good Neighbor Energy Fund, Energy Bucks, information about the winter moratorium and various other related energy programs and services for income-eligible customers were major topics of discussion.

In addition, the meetings are an appropriate forum to request the support of the 150 agencies, legislators, town officials who are invited in spreading information about our Residential Discount Rate and various other programs and services to their clients and constituents who are customers of WMECO.

4. Point of Sale Displays (POS) for our Residential Discount Rate applications are distributed throughout the WMECO service territory. The displays are distributed in face-to-face meetings with community groups, non-profit organizations and individuals to introduce or provide an update of WMECO's Residential Discount Rate.

5. In January, 2002, WMECO initiated a process to study how best to identify low income customers and determine the best way to reach these customers. WMECO contracted with nationally known consultant, Mark Wolfe of Eastham Associates, who is also the Executive Director of NEADA (National Energy Assistance Directors Association) to do the study. We presented our plan to other utilities in Massachusetts and invited them to participate in the study. With their participation, the study became a state-wide study. The results were published this spring.

The study provided valuable information from census data such as income level and language spoken with recommendations to better reach these customers. WMECO has expanded our outreach efforts to encompass the study recommendations by joining other Massachusetts utilities in launching Energy Bucks in November, 2003.

6. Energy Bucks is a comprehensive marketing campaign to educate Massachusetts residents about the programs available to them and encourage qualifying households to participate in them. The Energy Bucks campaign promotes fuel assistance, low-income energy rates and energy efficiency services as a package. Considerable time was spent in 2003 to create Energy Bucks however most of the benefit to our customers will be in 2004 and beyond. The Energy Bucks campaign kicked-off in November and is being advertised through radio, transit, newspaper advertising and brochures. An Energy Bucks website is also available www.energybucks.com.

Western Massachusetts Electric, Massachusetts Electric, Nantucket Electric, NSTAR Electric & Gas, Unitil, Bay State Gas and KeySpan Energy Delivery collaborated with the Massachusetts Community Action Program Directors' Association (MASSCAP) and the Low-Income Energy Affordability Network (LEAN) to promote the benefits of Energy Bucks.

WMECO is working with a local agency to customize Energy Bucks to the specific needs of the western Massachusetts population. Materials will be translated into Vietnamese and Russian to reach the customers in these communities.

WMECO is in the process of adding a link to the Energy Bucks website (www.energybucks.com) from the WMECO website (www.wmeco.com).

7. WMECO continues to work with Don Johnson of the Department of Transitional Assistance ("DTA") to outreach to, inform, enroll, and recertify eligible customers in the Residential Discount Rate program.

8. WMECO works closely with each of the four fuel assistance agencies [New England Farm Workers ("NEFWC"), Franklin Community Action ("FCAC"), Berkshire Community Action ("BCAC"), and Valley Opportunity Council ("VOC")] in western Massachusetts to identify those customers of WMECO who are recipients of fuel assistance benefits at 175% of poverty and enroll them in the Residential Discount Rate program.

9. Customers who receive MassHealth benefits administered by the Division of Medical Assistance and the Department of Transitional Assistance are verified for the Residential Discount Rate by exchanging information on disks through the mail.

10. WMECO identified New England Farm Workers Council (NEFW) as the largest agency with WMECO fuel assistance customers. WMECO partnered with a local college to investigate electronic data transfer between community action agencies. The students presented their evaluation to WMECO. The WMECO and Northeast Utilities (NU) Information Technology groups have the process under review to determine compatibility with our mainframe computer system.

11. WMECO continued the collaboration with the Springfield School Department to reach the approximately 15,000 free lunch students and encourage their families to enroll in the Residential Discount Rate.

Materials to encourage free school lunch recipient families to enroll in Energy Bucks are being developed. Families can save up to \$1,000 per year on their energy bills. These materials will be distributed throughout WMECO's service territory for the beginning of the 2004-2005 school year.

12. WMECO is invited to speak before various customer and community groups throughout the year. Discussions always include information about the Residential Discount Rate, Energy Savings Program, Good Neighbor Energy Fund, Special Accounts Group (to help customers with billing in arrears) and weatherization programs and services. These opportunities are our best form of outreach, especially for our elderly customers. Many people feel comforted that they can speak with a company representative

face to face to receive the assistance they need. In 2003, Energy Bucks was added to the information provided in our outreach sessions.

13. As of December 22, 2003 the following figures are available for WMECO's web site (www.wmeco.com): the Residential Discount Rate page received 2,951 visitors this year (16% increase over 2002). Mass211 Gateway, was downloaded 2,689 times (30% increase over 2002). The Residential Discount Rate English application was downloaded 2,569 times (84% increase over 2002) and the Residential Discount Rate Spanish application was downloaded 341 times (52% increase over 2002). The specific DTE rate page was downloaded 290 times. Helpline (Spanish) had 681 downloads, Helpline (English) had 653 downloads and Neighbors (Spanish/English) had 2,432 downloads.

In addition, the Residential Discount Rate information is always on WMECO's bill envelope and the message appeared 15 times in customer communications (i.e. bill inserts, Consumer News and on-bill messages).

14. Energy Bingo is our most popular outreach to seniors. Game winners receive energy efficient prizes and each bingo square matches up with a conservation tip. The most popular senior outreach event is Senator Brian Lees "Golden Gathering" held each August at Western New England College in Springfield. Two sessions of Energy Bingo are held. The Golden Gathering draws approximately 2,000 seniors. In between games, we present information for discussion regarding the Residential Discount Rate, weatherization services, Good Neighbor Energy Fund, deregulation and other relevant topics. Energy Bingo is held upon request at various locations throughout WMECO's service territory.

15. WMECO continues to work with the Hampden County Sheriff's Department at the Community Safety Center in Springfield to assist clients in the After Incarceration Program. The Sheriff's Department has combined their men's and women's groups. A WMECO representative speaks with these groups on an as needed basis to reach clients who are completing the program to ensure that they are made aware of the benefits available. The discussion includes the Residential Discount Rate, energy saving measures, WMECO's Energy Savings Program, Good Neighbor Energy Fund, Energy Bucks and various topics to make our programs and services available. WMECO made three presentations at the Community Safety Center in 2003, with an average of 20 clients in each session.

16. In July, 2002, WMECO streamlined an option for customers to view their own account information on the WMECO web page. Customers who do not have web access and/or customers applying for assistance can bring the required information to a community action agency and give an agency representative permission to access their account information. This information can help the customer qualify to receive benefits.

This option has been very well received by the Community Action Agencies because they are able to access consumption data while the representative is working with the client. This year we have heard from more agencies and representatives from the agencies who are accessing information from our website.

17. WMECO actively participates in statewide groups that are dedicated to improving the availability of programs and services to income eligible customers. Some of these groups include LIHEAP, LEAN, Good Neighbor Energy Fund, the Energy Benefits Task Force and Energy Bucks.

18. WMECO has worked hard to develop individual relationships with key agency leaders beyond the social agency meetings. WMECO has had individual meetings, participated in workshops and local fairs to ensure our assistance opportunities reach the customers who will benefit from them. Some of these groups include: various councils on aging, Massachusetts Society for the Prevention of Cruelty to Children, Habitat for Humanity, Urban League Foster Grandparent Program, Mount Marie Elder Conference, Wal-Mart Women's Health Fair, Vietnamese Civic Association, Head Start and the Puerto Rican Cultural Center.

19. A WMECO representative attended the National Community Action Foundation Conference to find new ways to work together to help our mutual customers.

20. WMECO devoted considerable resources to customer outreach in 2003. WMECO employs a full-time Community Outreach Representative. WMECO's portion of the low income study which lead to the Energy Bucks campaign was \$30,000. WMECO contributed \$37,500 in energy efficiency dollars to the Energy Bucks campaign as well as an additional \$20,000 in shareholder dollars to customize the Energy Bucks campaign for western Massachusetts. WMECO reprinted the Residential Discount Rate application in English and

Spanish. I do not have a breakdown of printing costs for the applications or the printing costs for the various other printed materials that the information was included on.

The 2004 budget has not been finalized yet however WMECO is committed to funding programs and materials to support our low-income customers and encourage their participation in our programs and services.

21. In summary, WMECO has increased the number of customers enrolled in the Residential Discount Rate, while working with local, regional and statewide organizations. We look forward to continuing and improving our efforts to reach all of our eligible customers.

I hope this information is helpful. If you have any questions or need clarification of any item, please call me at 413-787-9206.

Thank you.

Sincerely,

Kathleen T. Agin

Kathleen T. Agin
Community Outreach Representative

December 31, 2004

Ms. Karin Pisiewski
Consumer Affairs Coordinator
Division of Energy Resources
100 Cambridge Street STE 1020
10th Floor
Boston MA 02114

Re: Status of WMECO's Outreach Efforts for Residential Discount Rate

Dear Karin:

Western Massachusetts Electric Company ("WMECO") has been conducting ongoing outreach to low-income customers in response to G.L.c.164, sec.1F(4)(I) as well as DTE 01-106. Efforts over the past year are as follows:

1. In January, 2002, WMECO initiated a process to study how best to identify low income customers and determine the best way to reach these customers. WMECO contracted with nationally known consultant, Mark Wolfe of Eastham Associates, who is also the Executive Director of NEADA (National Energy Assistance Directors Association) to do the study. We presented our plan to the other utilities in Massachusetts and invited them to participate in the study. Western Massachusetts Electric Company, Massachusetts Electric, Nantucket Electric, NSTAR Electric & Gas, UNITIL, Baystate Gas and KeySpan Energy Delivery collaborated with MASSCAP (Massachusetts Association for Community Action) and LEAN (Low-income Energy Affordability Network). With their participation, the study became a state-wide study. The results were published in the spring of 2003. The Cape Light Compact joined the statewide Energy Bucks campaign in 2004.

The study provided valuable information from census data such as income level and language spoken with recommendations to better reach these customers. WMECO has expanded our outreach efforts to encompass the study recommendations by joining other Massachusetts utilities in launching Energy Bucks in November, 2003.

2. The statewide Energy Bucks campaign began with English and Spanish materials. The campaign was reviewed by the participating utility companies in the September and the campaign was expanded to include materials in Portuguese as well. The utilities have increased the funding for the Energy Bucks campaign. The initial campaign was for \$375,000. The campaign for the 2005 and 2006 heating seasons has been increased to a total of \$938,000. New promotional materials have been produced including: subway cards, radio and television ads in eastern Massachusetts and radio ads in western Massachusetts. This is a link to the statewide Energy Bucks radio ad.



Catch_EB04_01_60r.mp3

3. In September, 360 Communications, part of the Energy Bucks creative team held focus groups at ABCD (Action for Boston Community Development, Inc.) in Boston, CTI (Community Teamwork Inc.) in Lowell and at LEO (Lynn Economic Opportunity Inc.) in Lynn to gather feedback from Energy Bucks participants at the respective agencies.

4. WMECO began the creative process for a customized Energy Bucks campaign for our customers in western Massachusetts customers in late 2003. The campaign was rolled out this spring. We analyzed our population and made the determination to provide materials in English, Spanish, Russian and Vietnamese. We produced postcards with our campaign information "One number, lots of help, Just Ask" and included the toll free number (866-537-7267) and web address (www.energybucks.com). The front of the postcard features an African American woman (English and Spanish versions), an elderly Caucasian woman holding a young child (Russian version) and an Asian man (Vietnamese version). We felt that it is extremely important that the person looking at the Energy Bucks information makes a

connection with the people. The images were chosen because they are representative of the population we are trying to reach. We wanted the images to project a familiarity that the people participating in Energy Bucks are not ashamed, they look like someone you might know. The same images were used in posters as well. All three photos are featured on posters in all four languages. The African American woman was used on bus signs in Springfield and the elderly woman and child were used on bus ads in Franklin County.

5. WMECO placed ads on a regular basis in the following newspapers: *El Pueblo Latino* (Spanish), *The Messenger* (Russian) and *African American Point of View*. We will continue to use ads in these newspapers to reach our target populations. We also sponsored an Energy Bucks ad for Jewish Geriatric Services.

6. WMECO continued our outreach by focusing our efforts on educating our customers about all the programs and services available to them. Our outreach packet is a "living document". We include basic information on Energy Bucks, the Good Neighbor Energy Fund, Citizen's Energy, *45 Ways to Use Energy Wisely* (brochure), an Appliance Tips (to help you save energy) appliance wheel and WMECO's Energy Star Lights catalog. We also include information beneficial to the groups we speak with. For example, some information may be for a specific county program or agency program or it may be a non-energy low income program.

This year WMECO partnered with MassMutual to provide information on MassMutual's LifeBridge program in our outreach packet. LifeBridge is providing 20,000 term life policies, each with a \$50,000 death benefit to help qualified parents to protect their child's education. This program targets families with an income level of \$10,000 to \$40,000 per year. More information is available on MassMutual's website at www.massmutual.com/lifebridge. The program will run until the end of 2007 or until 20,000 policies have been written. MassMutual has done significant advertising to promote the LifeBridge Program and had a low response. WMECO felt this was a natural fit to package LifeBridge information with our outreach information since we are targeting the same population. The LifeBridge Program has been an incentive for our customers to share our outreach information and LifeBridge information with other customers.

We also include information on free banking for low income customers in Massachusetts. More information can be found on the Massachusetts Community & Banking Council web site at <http://www.masscommunityandbanking.org/Index.htm>.

7. WMECO included the Residential Discount Rate information on a monthly basis in our customer communications, including bill inserts, on-bill messages, on-envelope messages and special inserts specifically sent to customers with payment in arrears. The link to WMECO's discount information on our web site (www.wmeco.com) is <http://www.wmeco.com/community/media/low.asp>

The Energy Savings Program, Good Neighbor Energy Fund, information about the winter moratorium, and various other related energy programs and services for income-eligible customers were also included throughout the year in customer communications. These programs and services, as well as the Residential Discount Rate information, were also featured throughout the year in the region's daily and weekly newspapers, newsmagazines, television broadcasts and radio broadcasts.

8. In 2004, WMECO changed from our Smart Living catalog to the new Energy Star Lights catalog (energy efficient products) exclusively for WMECO customers.

9. Each year, meetings are held with social agencies serving WMECO's customers throughout western Massachusetts. This year's meetings were held on October 18, in Pittsfield for agencies serving our communities in the Berkshire County (WMECO's Northern Division); on November 2, in West Springfield for agencies serving our communities in Hampden County (WMECO's Southern Division) and on November 10, in Hadley for agencies serving our communities in the Franklin and Hampshire Counties (WMECO's Northern Division). We continue to build a network of people from traditional and nontraditional agencies to reach the people in need of our services. Our network includes over 400 individuals who have the opportunity to share information about our services to help people in need. We are working with people from schools, agencies who visit customers in their homes, health agencies and others who already have the confidence of the customers we are trying to reach. When these agency workers share

Energy Bucks information with someone who needs assistance, it is accepted because there is already a trust between those individuals.

Financial hardship coding, the Residential Discount Rate, the Energy Savings Program, Good Neighbor Energy Fund, Energy Bucks, information about the winter moratorium and various other related energy programs and services for income-eligible customers were major topics of discussion.

10. WMECO partnered with Franklin County Home Care Corporation (FCHCC) this fall to reach homebound customers in Franklin County. FCHCC obtained a federal grant to purchase smoke detectors to be installed in shut-in's residences. WMECO purchased 1000 special flashlights which turn on in the event of a power failure. FCHCC brings the smoke detector and flashlight from WMECO and provides our Energy Bucks information to the recipients. Again, the resident receives the outreach information from someone they trust and are more likely to act on it. Franklin Community Action Corporation (FCAC) will assist shut-ins to receive all benefits and services through Energy Bucks in the event they can't go to FCAC's office.

11. WMECO continues to work with Don Johnson of the Department of Transitional Assistance ("DTA") to outreach to, inform, enroll, and recertify eligible customers in the Residential Discount Rate program.

12. WMECO works closely with each of the four fuel assistance agencies [New England Farm Workers ("NEFWC"), Franklin Community Action ("FCAC"), Berkshire Community Action ("BCAC"), and Valley Opportunity Council ("VOC")] in western Massachusetts to enroll our customers in all benefits and services they are eligible for through Energy Bucks.

13. Customers who receive MassHealth benefits administered by the Division of Medical Assistance and the Department of Transitional Assistance are verified for the Residential Discount Rate by exchanging information on disks through the mail.

14. WMECO continued the collaboration with the Springfield School Department to reach the approximately 15,000 free lunch students and encourage their families to enroll in the Residential Discount Rate.

15. WMECO is invited to speak before various customer and community groups throughout the year. Discussions always include information about the Residential Discount Rate, Energy Savings Program, Good Neighbor Energy Fund, Energy Bucks, Special Accounts Group (to help customers with billing in arrears) and weatherization programs and services. These opportunities are our best form of outreach, especially for our elderly customers. Many people feel comforted that they can speak with a company representative face to face to receive the assistance they need

WMECO continues to work with the Hampden County Sheriff's Department at the Community Safety Center in Springfield to assist clients in the After Incarceration Program. The Sheriff's Department has combined their men's and women's groups. A WMECO representative speaks with these groups on an as needed basis to reach clients who are completing the program to ensure that they are made aware of the benefits available. The discussion includes the Residential Discount Rate, energy saving measures, WMECO's Energy Savings Program, Good Neighbor Energy Fund, Energy Bucks and various topics to make our programs and services available. WMECO made three presentations at the Community Safety Center in 2003, with an average of 20 clients in each session.

16. In 2004, WMECO became part of a team meeting with an average of 70 inmates at the Hampden County House of Corrections in Ludlow on a monthly basis. The team includes members from the Hampden County Anti-Drug Coalition, The Open Pantry, the Hampden County Sheriff's Department and The Council of Churches of Greater Springfield. WMECO provides our outreach packet to help ease the transition for the inmate after release. The inmates also share the information with their family members, many who are experiencing financial difficulty because of the family member's incarceration.

A WMECO representative also presents outreach information twice a month in orientation sessions for the inmates newly transferred into the Pre-Release Program at the Hampden County House of Correction. Working with members of the Hampden County Sheriff's Department, we are looking at the possibility of presenting our outreach packets to inmates and family members. The partnership with the Sheriff's Department has been very

successful. The inmates now assemble WMECO's outreach packets and receive community service time for their efforts.

17. In July, 2002, WMECO streamlined an option for customers to view their own account information on the WMECO web page. Customers who do not have web access and/or customers applying for assistance can bring the required information to a community action agency and give an agency representative permission to access their account information. This information can help the customer qualify to receive benefits.

This option has been very well received by the Community Action Agencies because they are able to access consumption data while the representative is working with the client. WMECO periodically reviews our web site and makes new features available to help our customers.

18. WMECO actively participates in statewide groups that are dedicated to improving the availability of programs and services to income eligible customers. Some of these groups include LIHEAP, LEAN, the Good Neighbor Energy Fund and Energy Bucks.

19. WMECO has worked hard to develop individual relationships with key agency leaders beyond the social agency meetings. WMECO has had individual meetings, participated in workshops and local fairs to ensure our assistance opportunities reach the customers who will benefit from them. Some of these groups include: various councils on aging, Massachusetts Society for the Prevention of Cruelty to Children, Habitat for Humanity, Berkshire Disability Pride Day and High Street Health Fair. This year we also provided Energy Bucks information to a landlord who was helping homeless families move into affordable housing.

WMECO also worked with the Center for New Citizens in Pittsfield to assist the immigrant and refugee population in the area. We were able to help clear up a misconception regarding whether social security numbers are required for applying for fuel assistance. This has encouraged more refugees and immigrants to apply for fuel assistance and Energy Bucks.

20. A WMECO representative attended the 2004 Joint Low Income Energy Conferences (National Fuel Funds Network and National Low Income Energy

Conference) in St. Louis. This was a wonderful opportunity to meet people from around the country and learn more about helping the low income population we serve.

21. In summary, WMECO has averaged 20,000 customers enrolled in the Residential Discount Rate, while working with local, regional and statewide organizations. We will continue to build new partnerships for the benefit of our mutual customers. WMECO will continue our localized Energy Bucks campaign while actively supporting and participating in the statewide campaign to reach all of our eligible customers.

I hope this information is helpful. If you have any questions or need clarification of any item, please call me at 413-787-9206.

Thank you.

Sincerely,

Kathleen T. Agin
Community Outreach Representative

enclosures: (outreach packets and postcards sent via USPS mail)

Witness: Robert G. Johnston
Request from: Department of Telecommunications and Energy

Question:

For each of the last twelve months, please provide the total number of low-income customers, the number of customers added to the low-income discount rate in each month and the number of customers removed from the low-income discount rate in each month.

Response:

The following data was compiled from existing Customer Service System reports.

<u>Report Date</u>	<u>Total Discount Customers</u>	<u>Accounts Added</u>
September 7, 2005	23,112 (includes DTA match file accounts)	3,121
August 5, 2005	20,772	241
July 7, 2005	20,993	425
June 7, 2005	21,054	655
May 6, 2005	20,843	872
April 6, 2005	20,633	unknown
March 7, 2005	20,289	802
February 4, 2005	19,853	1,077
January 6, 2005	19,401	412
December 6, 2004	19,350	unknown
November 3, 2004	19,526	342
October 5, 2004	19,678	435

Notes: 1. Customer counts above may differ slightly from those in the response to Q-DTE1-001 due to the timing of the report. Customers moving within and out of our service territory affects total customer counts.
2..The "Accounts Added" reports for December 6, 2004 and April 6, 2005 are not available and no data has been included for those periods.